

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SCOTT KIMBALL , ON BEHALF OF HIMSELF AND ALL
OTHERS SIMILARLY SITUATED,

PLAINTIFF,

VS.

MBNA CORP., BRUCE L. HAMMONDS, KENNETH A.
VECCHIONE, RICHARD K. STRUSTHER, CHARLES C.
KRULAK, JOHN R. COCHRAN, III, MICHAEL G.
RHODES, LANCE L. WEAVER AND JOHN W. SCHEFLEN,

DEFENDANTS.

Case No. 1:05-cv-04725-KMK

VIRGINIA McMATH, ON BEHALF OF HERSELF AND ALL
OTHERS SIMILARLY SITUATED,

PLAINTIFF,

VS.

MBNA CORP., BRUCE L. HAMMONDS, KENNETH A.
VECCHIONE, RICHARD K. STRUSTHER, CHARLES C.
KRULAK, JOHN R. COCHRAN, III, MICHAEL G.
RHODES, LANCE L. WEAVER AND JOHN W. SCHEFLEN,

DEFENDANTS.

Case No. 1:05-cv-05168-KMK

**DECLARATION OF CURTIS V. TRINKO
IN SUPPORT OF MOTION OF THE KIMBALL MOVANTS FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFFS,
AND FOR APPROVAL OF SELECTION OF CO-LEAD COUNSEL**

I, Curtis V. Trinko, under penalty of perjury, hereby declare:

1. I am the principal attorney with the law firm entitled the Law Offices of Curtis V. Trinko, LLP. I submit this declaration in support of the Motion of Kimball Movants for Consolidation, Appointment As Lead Plaintiffs, And For Approval Of Selection Of Co-Lead Counsel.

2. Attached hereto as Exhibit A are true and correct copies of the PSLRA notice published on *Business Wire* on May 5, 2005.

3. Attached hereto as Exhibit B is a true and accurate copy of the PSLRA certifications for Scott Kimball, Virginia McMath, M.B. Kajbafnezhad, James Moran, and Nancy Kisha Moran.

4. Attached hereto as Exhibit C is the estimate of Movant's losses.

5. Attached hereto as Exhibit D is a true and accurate copy of the firm resume of the Law Offices of Curtis V. Trinko, LLP.

6. Attached hereto as Exhibit E is a true and accurate copy of the firm resume of the Law Office of Alfred G. Yates Jr., PC.

Dated: July 5, 2005
New York, New York

/s
Curtis V. Trinko